

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

JEREMY W. SCHULMAN,

\*

Plaintiff

\*

v.

\* Civil Action No.: 8:21-cv-1252-LKG

AXIS SURPLUS INSURANCE  
COMPANY, ENDURANCE AMERICAN  
SPECIALTY INSURANCE COMPANY  
and PROSIGHT SYNDICATE 1110 AT  
LLOYD'S,

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Defendant

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**STIPULATION AND [PROPOSED] AMENDED SCHEDULING ORDER**

Whereas, Plaintiff Jeremy W. Schulman ("Plaintiff") and Defendants AXIS Surplus Insurance Company, Endurance American Specialty Insurance Company and Prosight Syndicate at 1110 at Lloyd's (collectively, "Defendants," with Plaintiff, the "Parties") appeared before this Court on July 22, 2021 for an initial status conference regarding the initial proposed Scheduling Order (Dkt. No. 32) entered in this case;

Whereas, the Parties were directed to meet and confer regarding any proposed or required modifications to the Scheduling Order, including those the Parties believe necessary on account of the parties' respective proposed motions for summary judgment;

Whereas, following the initial conference, the Parties have fully briefed their respective motions for summary judgment;

Whereas, the Parties have met and conferred regarding the initial Scheduling Order (Dkt. No. 32) entered in this case and jointly stipulate to their belief that resolution of their respective motions for summary judgment will impact the necessity and scope of certain discovery in this matter further necessitating modification to the initial Scheduling Order;

Whereas, this is the Parties' first request to extend deadlines and is not intended to cause undue delay or prejudice to any party;

Therefore, the Parties respectfully request that this Court enter this proposed order modifying Section I of the initial Scheduling Order as it relates to expert discovery as follows:

I. DEADLINES

November 7, 2021:	Plaintiff's Rule 26(a)(2) expert disclosures.
December 7, 2021:	Defendant's Rule 26(a)(2) expert disclosures.
December 21, 2021:	Plaintiff's rebuttal Rule 26(a)(2) expert disclosures.
January 22, 2022:	Rule 26(e) supplementation of disclosures and responses.
February 14, 2021:	Discovery deadline; submission of status report in compliance with § III of this order.
February 21, 2021:	Requests for admission.

COHEN ZIFFER FRENCHMAN &  
MCKENNA

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Lydia K. Griggsby, U.S.D.J.